

**FARRIS MATHEWS BRANAN
BOBANGO
HELLEN & DUNLAP, PLC**

ATTORNEYS AT LAW

HISTORIC CASTNER-KNOTT BUILDING
618 CHURCH STREET, SUITE 300
NASHVILLE, TENNESSEE 37219

Charles B. Welch, Jr.
cwelch@farrismathews.com

Telephone (615) 726-1200
Facsimile (615) 726-1776

Writers Direct Dial
615-687-4230

February 10, 2004

Ron Jones, Director
As Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

RE: Implementation of the Federal Communications Commission's Triennial Review
Order (Nine-Month Proceeding) – Loop and Transport
Docket No. 03-00527

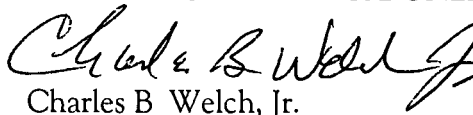
Dear Director Jones:

Please find enclosed for filing, an original and 14 copies of Time Warner Telecom of the Midsouth, LLC's responses to the second data request in the above referenced matter. Please date stamp one copy for my records. The documents submitted in response to the request is considered proprietary information and is filed under seal and each page thereof is marked "Confidential." Parties of record have been served.

Thank you for your assistance regarding this matter. If you have any questions or if I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC


Charles B. Welch, Jr.

CBW/ale
Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

February 10, 2004

IN RE)	Docket No 03-00527
IMPLEMENTATION OF THE FEDERAL)	
COMMUNICATIONS COMMISSION'S)	
TRIENNIAL REVIEW ORDER)	
NINE-MONTH PROCEEDING –)	
LOOP AND TRANSPORT)	

**TIME WARNER TELECOM OF THE MIDSOUTH, LLC'S
RESPONSES TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
SECOND DATA REQUESTS**

Comes now Time Warner Telecom of the Midsouth, LLC ("TWTC"), by and through its counsel of record and responds to Bellsouth Telecommunications, Inc.'s Request as follows

ADMISSIONS & INTEROGATORIES

1 Please admit that TWTC has self-reported in CLONES (Central Location Online Entry System) database from Telecordia or to other third parties that it has deployed high capacity loop facilities to the addresses listed in the confidential attachment

Answer: It is TWTC's understanding that CLONES does not contain reference to products such as high capacity loop facilities; however, TWTC does admit that it updates CLONES on a daily basis.

2 Please admit that TWTC has deployed high capacity loop facilities to the addresses listed in the confidential attachment

Answer: TWTC admits that it has deployed high capacity loop facilities to the addresses listed in the confidential attachment except to the addresses highlighted.

3 Please admit that TWTC has deployed high capacity transport facilities to each of the central offices (identified by CLLI codes) listed in the confidential attachment

Answer: TWTC admits that it has deployed high capacity transport facilities to each of the central offices (identified by CLLI codes) listed in the confidential attachment except the CO highlighted.

4 Please admit that TWTC can route or transport traffic using TWTC's own facilities between any pair of central offices to which it has deployed high capacity transport facilities in [state] This includes routing or transporting traffic directly between the central offices or indirectly through an intermediate aggregation point, such as TWTC's switch or the switch of another CLEC

Answer: TWTC admits that it can route or transport traffic using TWTC's own facilities between any pair of central offices to which it has deployed high capacity transport facilities in that state.

5 Please admit that TWTC has fiber based collocation arrangements at the central offices (identified by CLLI code) listed in the confidential attachment

Answer: TWTC admits that it has fiber based collocation arrangements at each of the central offices (identified by CLLI codes) listed in the confidential attachment except at the CO highlighted.

6 If TWTC has denied any of the previous Requests for Admissions, state all facts and identify all documents that support such denial

Answer: Not applicable.

7 For each high-capacity transport facility deployed by TWTC in [state], describe with particularity the nodes or termination points along each such facility route

Answer: See responses to the first set of TWTC's responses and the above responses. TWTC objects to giving any further information based upon the limited discovery originally agreed upon between the parties.

- 8 8 If TWTC has deployed any high capacity loop facilities in any of the Southeastern states, please provide the percentage of buildings where the TWTC installed its own inside wiring, the percentage of buildings where the TWT is leasing inside wiring from another carrier, including the ILEC, and the percentage of buildings where the TWTC is using inside wiring owned by the building owner In each of these situations, please describe with specificity the cost paid for installing or leasing the inside wire in buildings

Answer: TWTC objects to answering this question based upon the limited discovery originally agreed upon between the parties.

REQUESTS FOR PRODUCTION

- 1 Produce any documents identified above

Answer: See Attached Excel Spreadsheet.

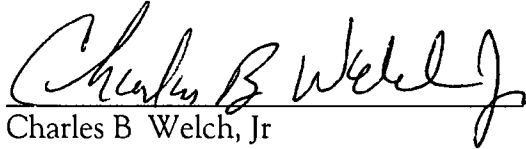
TWTC REGIONAL CONFIDENTIAL ATTACHMENT

See Attached Excel Spreadsheet

Dated this 10th day of February 2004.

Respectfully submitted,

**FARRIS, MATHEWS, BRANAN
BOBANGO HELLEN & DUNLAP, P.L.C.**

A handwritten signature in cursive script, reading "Charles B. Welch, Jr.", written in black ink.

Charles B. Welch, Jr

Attorney for Respondent, Time Warner Telecom
of the Mid-South, LLC
618 Church Street, Suite 300
Nashville, Tennessee 37219
(615) 726-1200

CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2004, a copy of the foregoing document was serviced on the parties of record, via US mail

Martha M. Ross-Bain, Esq.
AT&T Communications of the
South Central States, LLC
1200 Peachtree, Suite 8062
Atlanta, GA 30309

Ms Carol Kuhnow
Qwest Communications, Inc
4250 N Fairfax Drive
Arlington, VA 33303

Henry Walker, Esq
414 Union Street, Suite 1600
P O Box 198062
Nashville, TN 37219

Jon E Hastings
Boulton Cummings Connors Berry, PLC
P O Box 198062
Nashville, TN 37291-8062

Timothy Phillips, Esq
Office of Tennessee Attorney General
P O Box 20207
Nashville, TN 37202

Dale Grimes
Bass, Berry & Sims
315 Deaderick Street, Suite 2700
Nashville, TN 37238-3001

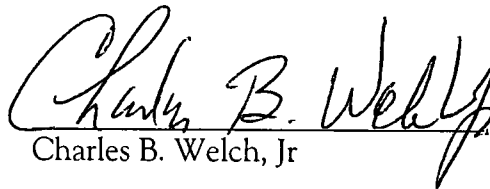
H LaDon Baltimore, Esq
Farrar & Bates
211 Seventh Ave , N #320
Nashville, TN 37291-1823

Mark W Smith, Esq
Strang, Fletcher, et al
One Union Square, #400
Chattanooga, TN 37402

James Wright, Esq
United Telephone – Southeast
14111 Capital Blvd
Wake Forest, NC 27587

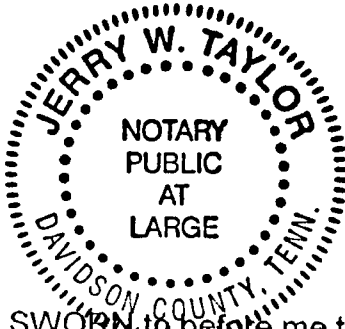
Nanette S Edwards, Esq
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802

Guy Hicks
BellSouth Telecommunications, Inc
333 Commerce Street, Suite 2101
Nashville, TN 37201


Charles B. Welch, Jr

VERIFICATION

I, Carolyn M Marek, first being duly sworn upon oath, depose and say that I am Vice-President Regulatory Southeast of Time Warner Telecom, and that I have read the attached documents and can attest to the accuracy of the information contained herein. To the best of my knowledge and belief, the information is true and correct and I have the authority to sign on behalf of Time Warner Telecom of South Carolina, L L C



Time Warner Telecom of South Carolina, LLC

By. Carolyn Marek
Carolyn M Marek

Its: Vice President Regulatory Southeast

SWORN to before me this

10th day of February, 2004

Jerry Taylor L S

Notary Public for
My Commission Expires 1-29-05